

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

REDIET W. SHIFERAW, *et al.*,

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*,

Defendants.

Civil Action No. 3:22-cv-00479-S

**DEFENDANTS’ UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND**

In this case, Plaintiffs Rediet W. Shiferaw and Million H. Hailemichael seek a writ of mandamus to compel U.S. Citizenship and Immigration Services (USCIS) to adjudicate Forms I-485, “Application to Register Permanent Residence or Adjust Status.” *See* Doc. 1 at 2. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendants respectfully move the Court for a 30-day extension of time to answer or otherwise respond to the complaint, which would extend the response deadline from May 6, 2022 to June 6, 2022. The reason for this extension request is that, on April 13, 2022, USCIS issued two requests for evidence to Plaintiffs. The responses to the requests for evidence are due by July 11, 2022, which constitutes the maximum period allowed for responding to requests for evidence. *See* 8 C.F.R. § 103.2(b)(8)(iv) (“The request for evidence . . . will indicate the deadline for response, but in no case shall the maximum response period

provided in a request for evidence exceed twelve weeks . . .”).¹ Upon receipt of the responses to the requests for evidence, USCIS will resume processing the Forms I-485. USCIS expects that, by June 6, 2022, it will have either completed adjudicating the Forms I-485, rendering the lawsuit moot, or at least be in a significantly better position to determine what additional steps may be necessary before completing adjudication. Plaintiffs do not oppose this extension request. Therefore, Defendants respectfully move the Court for a 30-day extension of time to answer or otherwise respond to Plaintiffs’ complaint, from May 6, 2022 to June 6, 2022.

Respectfully submitted,

CHAD E. MEACHAM
UNITED STATES ATTORNEY

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Attorneys for Defendants

¹ Defendants note that, in response to the Covid-19 pandemic, USCIS has extended flexibilities for responding to agency requests and, before taking any action, the agency will consider a response to a request for evidence that is received within 60 calendar days after the response due date set in the request. *See* <https://www.uscis.gov/newsroom/alerts/uscis-extends-flexibility-for-responding-to-agency-requests-1>.

Certificate of Conference

I certify that, on April 14, 2022, I conferred with Plaintiffs' counsel regarding this motion, and counsel stated that Plaintiffs do not oppose the motion.

/s/ Lisa R. Hasday
Lisa R. Hasday
Assistant United States Attorney

Certificate of Service

On April 14, 2022, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Lisa R. Hasday
Lisa R. Hasday
Assistant United States Attorney